

# **EXHIBIT A**

Final	Date	Description	Objection	Confidentiality Designation
R-PTX 1	N/A	Photograph of New York Yankees World Series Ring (On Hand)	*	
R-PTX 2	N/A	Photograph of Side Profile of New York Yankees World Series Ring (On Hand)	*	
R-PTX 3	2007.05.01	Wayne Barrett, <i>The Yankees's Clean-Up Man</i> , The Village Voice (May 1, 2007)	*	
R-PTX 4	2007.05.12	Jim Dwyer, <i>The Rings of Giuliani</i> , New York Times (May 12, 2007)	*	
R-PTX 5	2018.04.26	Photograph of Andrew Giuliani, Rudolph W. Giuliani and Unidentified Female with New York Yankees World Series Rings	*	
R-PTX 6	2018.04.26	Photograph of Andrew Giuliani, Rudolph W. Giuliani and Unidentified Female with New York Yankees World Series Rings	*	
R-PTX 7	2018.06.05	<i>Giuliani predicts his work for Trump will not harm his legacy</i> , CNN (June 5, 2018)	*	
R-PTX 8	2018.06.08	Photograph of World Series Rings (On Hand)	*	
R-PTX 9	2018.12.16	Alan Smith, <i>Rudy claims Michael Cohen hush payments, possible Russia collusion 'not a crime'</i> , NBC News (December 16, 2018)	*	
R-PTX 10	2019.00.00	2018 United States Gift (And Generation-Skipping Transfer) Tax Return for Rudolph W. Giuliani (Form 709)	*	Confidential
R-PTX 11	2019.00.00	2018 United States Gift Tax Return Addendum for Rudolph W. Giuliani	*	Confidential
R-PTX 12	2019.00.00	Rudolph W. Giuliani 2018 Tax Return	*	Confidential
R-PTX 13	2019.10.04	Rudolph W. Giuliani X Post with Photograph of RWG and Unidentified Man with Rings On Hand	*	
R-PTX 14	2019.12.11	<i>Rudy and Judith Giuliani finalize divorce</i> , foxbusiness.com (December 11, 2019)	*	
R-PTX 15	2020.07.01	Photograph of New York Yankees World Series Ring (On Hand)	*	
R-PTX 16	2022.00.00	Rudolph W. Giuliani 2021 Tax Return	*	Confidential
R-PTX 17	2022.06.07	Photograph of NY Yankees Ring On Hand	*	
R-PTX 18	2022.06.07	Photograph of Rudolph W. Giuliani and Andrew Giuliani with Side Profile of Rings	*	
R-PTX 19	2022.06.24	<i>Rudy Giuliani's Pitch to Hire My Son</i> , Politico (June 24, 2022)	*	
R-PTX 20	2022.10.15	Rudolph W. Giuliani X Post with Photograph of Rings On Hand	*	
R-PTX 21	2023.00.00	Rudolph W. Giuliani 2022 Tax Return	*	Confidential
R-PTX 22	2023.00.00	2022 Rudolph W. Giuliani Gift Tax Return	*	Confidential
R-PTX 23	2024.00.00	2023 Rudolph W. Giuliani Gift Tax Return	*	Confidential
R-PTX 24	2024.00.00	Rudolph W. Giuliani 2023 Tax Return	*	Confidential
R-PTX 25	2024.01.26	Affidavit of Rudolph W. Giuliani Pursuant to Local Rule 1007-1(B) attaching Schedule A/B (Property) and Schedule C (The Property You Claim as Exempt), <i>In re Giuliani</i> (No. 23-12055-shl Bankr. S.D.N.Y.)	*	
R-PTX 26	2024.01.26	Text Messages between Andrew Giuliani and Gary F.	*	
R-PTX 27	2024.01.26	Text Messages between Andrew Giuliani and Gary F.	*	
R-PTX 28	2024.02.07	Testimony of Rudolph W. Giuliani at 341 Meeting, <i>In re Rudolph Giuliani</i> (Case No. 23-12055-shl Bankr. S.D.N.Y.)	*	Confidential
R-PTX 29	2024.02.27	Schedule A/B (Property) and Schedule G (Executory Contracts and Unexpired Leases), <i>In re Giuliani</i> (No. 23-12055-shl Bankr. S.D.N.Y.)	*	
R-PTX 30	2024.05.14	Case Management Status Conference Transcript	*	
R-PTX 31	2024.05.25	Delta Airlines Flight Receipt for Andrew Giuliani dated May 25, 2024	*	
R-PTX 32	2024.06.17	Case Management Status Conference Transcript	*	
R-PTX 33	2024.08.30	Plaintiffs' Memo of Law ISO Motion to Enforce Judgment [Turnover Dkt. 09]	*	
R-PTX 34	2024.10.08	Memorandum of Law in Support of Andrew H. Giuliani's Motion to Intervene as Defendant, <i>Freeman et al. v. Giuliani et al.</i> (No. 24-MC-353-LJL S.D.N.Y.)	*	

Final	Date	Description	Objection	Confidentiality Designation
R-PTX 35	2024.10.08	Declaration of Scott B. McBride in Support of Andrew H. Giuliani's Motion to Intervene as Defendant, <i>Freeman et al. v. Giuliani et al.</i> (No. 24-MC-353-LJL S.D.N.Y.)	*	
R-PTX 36	2024.10.08	Declaration of Andrew H. Giuliani in Support of His Motion to Intervene as Defendant, <i>Freeman et al. v. Giuliani et al.</i> (No. 24-MC-353-LJL S.D.N.Y.)	*	
R-PTX 37	2024.10.08	Exhibit A to Declaration of Andrew H. Giuliani in Support of His Motion to Intervene as Defendant, <i>Freeman et al. v. Giuliani et al.</i> (No. 24-MC-353-LJL S.D.N.Y.)	*	
R-PTX 38	2024.10.09	<i>New York Yankees World Series Rings Embroiled in Rudy Giuliani Defamation Lawsuit</i> , Men's Journal (October 8, 2024)	*	
R-PTX 39	2024.10.16	Plaintiffs' Requests for Production to Andrew Giuliani	*	
R-PTX 40	2024.10.27	Intervenor Defendant Andrew H. Giuliani's Responses and Objections to Plaintiffs First set of Document Requests, <i>Freeman et al. v. Giuliani et al.</i> (No. 24-MC-353-LJL S.D.N.Y.)	*	
R-PTX 41	2024.10.27	Intervenor Defendant Andrew H. Giuliani's Responses and Objections to Plaintiffs First Set of Interrogatories, <i>Freeman et al. v. Giuliani et al.</i> (No. 24-MC-353-LJL S.D.N.Y.)	*	
R-PTX 42	2024.10.27	Intervenor Defendant Andrew H. Giuliani's Responses and Objections to Plaintiffs' Information Subpoena with Restraining Notice Pursuant to C.P.L.R. §§ 5222 and 5224, <i>Freeman et al. v. Giuliani et al.</i> (No. 24-MC-353-LJL S.D.N.Y.)	*	
R-PTX 43	2024.12.09	Andrew Giuliani's FRCP 26(a) Disclosures	*	
R-PTX 44	2024.12.11	Plaintiffs' Notice of Deposition of Andrew Giuliani	*	
R-PTX 45	2024.12.15	Declaration of Sean Kalin (UNEXECUTED)	*	
R-PTX 46	2024.12.15	INTENTIONALLY LEFT BLANK	*	
R-PTX 47	2024.12.19	Deposition Transcript of Andrew H. Giuliani	*	
R-PTX 48	2024.12.27	Deposition Transcript of Rudolph W. Giuliani	*	
R-PTX 49	2025.01.02	Defendant's Response to First Set of Plaintiffs' Request for Documents	*	
R-PTX 50	2024.11.18	Plaintiffs' First Set of Document Request to Defendant Rudolph W. Giuliani	*	
R-PTX 51	2024.12.15	INTENTIONALLY LEFT BLANK	*	
R-PTX 52	2023.08.30	<i>Freeman v. Giuliani</i> , 691 F.Supp.3d 32 (D.D.C. 2023).	*	
R-PTX 53	2023.12.21	Voluntary Petition for Individuals Filing for Bankruptcy, <i>In re Giuliani</i> , 23-12055, ECF No. 1 (Bankr. S.D.N.Y Dec. 21, 2023).	*	
R-PTX 54	2024.10.22	Opinion and Order re. Motion to Enforce Judgment (ECF No. 62)	*	
R-PTX 55	2024.11.13	Memo Endorsement Modifying Turnover Instructions Order (ECF No. 108)	*	
R-PTX 56	2024.11.22	Opinion and Order re. Modification to Turnover Instructions (ECF No. 148)	*	
R-PTX 57	2023.12.18	Final Judgment (21-cv-3354, D. D.C.) (ECF No. 142)	*	
R-PTX 58	2024.11.08	Opinion and Order re. Deadlines Set at November 7, 2024 Hearing (ECF No. 94)	*	